



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 7, 2021

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007


Re: *United States v. Rafael Valdovinos*, 19 Cr. 671 (VSB)

Dear Judge Broderick:


The parties respectfully write to request a two-week adjournment of the status conference currently scheduled for May 10, 2021 at 9:00 a.m. The Government has extended a plea agreement, and counsel for the defendant would like additional time to review the plea agreement with the defendant. The Government respectfully requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between May 10, 2021 and the date of the next conference. The defendant, through his attorney Jeffrey Chartier, Esq., has no objection to the exclusion of time.

Very truly yours,

AUDREY STRAUSS
United States Attorney

by: 
Nicholas W. Chiuchiolo
Kyle A. Wirshba
Assistant United States Attorney
(212) 637-1247 / 2493

cc: Jeffrey Chartier, Esq. (by ECF)

**APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 5/9/2021**

The status conference scheduled for May 10, 2021 is hereby adjourned to May 24, 2021 at 9:00 a.m. The adjournment is necessary to permit counsel sufficient time to review the plea agreement with the defendant. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between May 10, 2021 and May 24, 2021 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice.